

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

Jessica Anderson )  
                    )  
Plaintiff,       ) Case No. C-1-02-355  
                    )  
vs.               ) Judge Weber  
                    )  
Avon Products, Inc. )  
                    )  
Defendant.       )

**DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION  
OF THE DISPOSITIVE MOTION CUT OFF DEADLINE**

NOW COMES Defendant Avon Products, Inc., and for the reasons set forth in the attached Memorandum, requests an extension of the dispositive motion deadline in the above-referenced matter. Plaintiff does not oppose this Motion.

Respectfully submitted,

/s/ Jeffery L. VanWay  
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and

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Trial Attorneys for Defendant

**MEMORANDUM**

The dispositive motion deadline is currently set for October 31, 2003. The trial is set for the March 2004 term.

Counsel for Defendant completed the deposition of Plaintiff on Tuesday, October 21. Plaintiff's counsel also completed the depositions of two of Defendant's representatives at this same time. Defendant has been advised by the court reporter that the transcripts of these depositions will not be available until at least October 31. Because Defendant needs to review these deposition transcripts prior to filing its Motion for Summary Judgment, and because Defendant anticipates relying on these depositions as support for its Motion for Summary Judgment, Defendant requests a short extension of the motion cutoff date from October 31, 2003 to November 14, 2003.

Defendant has spoken to Plaintiff's counsel regarding this extension and has been advised that Plaintiff does not oppose this extension. Defendant does not anticipate that this extension will affect the trial date.

Respectfully submitted,

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Trial Attorneys for Defendant  
**CERTIFICATE OF SERVICE**

This shall certify that a true copy of the foregoing was duly served upon Daniel A. Kruse, Attorney for Plaintiff, 1029 Main Street, Cincinnati, Ohio 45202, by regular U.S. mail, postage prepaid on this 10<sup>th</sup> day of October, 2003.

/s/ Jeffery VanWay \_\_\_\_\_  
Jeffery VanWay